

Lewis E. Byrd, III,
Plaintiff

CASE NO. 17-CV-191-JDP

v.

Brandon Arnez,
Defendant

Motion

Motion for extension to file reply to Summary Judgment for 120 days based on: 1.) Briefing order set March, 2018 as the deadline;

2.) I have not received discovery yet and this needed to refute the claims made in Summary Judgment motion;

3.) def. are trying to obtain a tactical advantage by providing me only until 12/4/17 to respond when they know that I'm awaiting discovery;

4.) denying me discovery and only 21 days to reply without discovery, will result in denying me justice.

5.) Based on the complex issues in the Defendants Summary Judgment motion and my limited ability to defend or prosecute the issue, I renew my request for appointment of counsel.

Dated:
12.1.17

By Lewis E. Byrd, III
Lewis E. Byrd, III